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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 HAILEY FERGUSON,

10 Plaintiff,

11 vs.

12 JUANA PURCELL; DOES I through X,
13 inclusive,

14 Defendant.

CASE NO: 2:20-cv-00663-APG-VCF

15 **STIPULATION AND ORDER TO EXTEND DEADLINE**
16 **FOR PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION**
TO QUASH SERVICE OF PROCESS

17 IT IS HEREBY STIPULATED AND AGREED, by and between WILLIAM W.
18 McGAHA, ESQ. of the law firm of SCHUETZE, McGAHA, TURNER & FERRIS, PLLC,
19 counsel for Plaintiff HAILEY FERGUSON, and ERNEST MP MORAN, ESQ. of the law
20 firm RANALLI, ZANIEL FOWLER & MORAN, LLC, counsel for Defendant JUANA
21 PURCELL, that:

22 The due date for Plaintiff's Opposition to Motion to Quash Service of Process,
23 (ECF No. 5), be extended from May 15, 2020 to May 19, 2020.

24 This Request for an extension of time is not sought for any improper purpose or
25 other purpose of delay. This request for extension is based upon the following:

26 Plaintiff's counsel's mother died suddenly due to COVID 19.

27 This is the parties first request to extend this deadline, which is made in good faith
28 and not for purposes of delay.

WHEREFORE, the parties respectfully request that this Court extend the time for Plaintiff to file her Opposition to Motion to Quash Service of Process from May 15, 2020 to May 19, 2020.

DATED this 12th day of May 2020.

**SCHUETZE, McGAHA, TURNER
& FERRIS, PLLC.**

By: /s/William W. McGaha
WILLIAM W. McGAHA, ESQ.
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By: /s/Ernest MP Moran
GEORGE M. RANALLI, ESQ.
ERNEST MP MORAN, ESQ.
2400 W. Horizon Ridge Parkway
Henderson, Nevada 89052
Attorney for Defendant

ORDER

IT IS SO ORDERED.

DATED this 12th day of May, 2020.



U.S. MAGISTRATE JUDGE

Respectfully submitted by:

SCHUETZE & McGAHA, P.C.

By: /s/William W. McGaha
WILLIAM W. McGAHA, ESQ.
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